STATE OF SOUTH CAROLIN	A)						
(Caption of Case))	BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA					
In RE:	,)	COVERS	NK KARATATA				
Application of Utilities Services of South Carolina, Inc. for adjustme rates and charges and modification certain terms and conditions for the provision of water and sewer services.	nt of) ons to) he	DOCKET NUMBER: 2007 -	286 <u>WS</u>				
(Please type or print)	.•	SC Bar Number: 68269					
Submitted by: Benjamin P. Mu	stian	Telephone: 803-252-3	3300				
Address: Post Office Box 8416		Fax: 803-771-2	2410				
Columbia, SC 29202		Other:	Annual Control of the				
Columbia, SC 2)202		Email: bmustian@willoughl	oyhoefer.com				
DO Emergency Relief demanded in ✓ Other:		FION (Check all that apply) quest for item to be placed on epeditiously	Commission's Agenda				
INDUSTRY (Check one)	NATUR	E OF ACTION (Check all the	at apply)				
Electric	Affidavit	Letter	Request				
Electric/Gas	Agreement	Memorandum	Request for Certification				
Electric/Telecommunications	Answer	Motion	Request for Investigation				
Electric/Water	Appellate Review	Objection	Resale Agreement				
Electric/Water/Telecom.	Application	Petition	Resale Amendment				
Electric/Water/Sewer	Brief	Petition for Reconsideration	Reservation Letter				
Gas	Certificate	Petition for Rulemaking	Response				
Railroad	Comments	Petition for Rule to Show Cause	Response to Discovery				
Sewer	Complaint	Petition to Intervene	Return to Petition				
Telecommunications	Consent Order	Petition to Intervene Out of Time	Stipulation				
Transportation	Discovery	Prefiled Testimony	Subpoena				
Water	Exhibit	Promotion	☐ Tariff				
X Water/Sewer	Expedited Consideration	Proposed Order	Other:				
Administrative Matter	Interconnection Agreement	Protest					
Other:	Interconnection Amendment	Publisher's Affidavit					
	Late-Filed Exhibit	Report					
	Print Form	Reset Form					

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW 930 RICHLAND STREET P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY JOHN M.S. HOEFER ELIZABETH ZECK* RANDOLPH R. LOWELL BENJAMIN P. MUSTIAN M. McMULLEN TAYLOR

*ALSO ADM TTED IN TX

November 29, 2007

AREA CODE 803 TELEPHONE 252-3300 TELECOPIER 256-8062



VIA HAND-DELIVERY

The Honorable Charles L.A. Terreni Chief Clerk/Administrator **Public Service Commission of South Carolina** 101 Executive Center Drive Columbia, South Carolina 29210

> Application of Utilities Services of South Carolina, Inc. for adjustment of rates RE: and charges and modifications to certain terms and conditions for the provision of water and sewer service; Docket No. 2007-286-WS

Dear Mr. Terreni:

Enclosed for filing are the original and twenty-five (25) copies of each of the following documents in the above-referenced docket:

- Rebuttal Testimony and supporting exhibits of Bruce T. Haas 1.
- Rebuttal Testimony and supporting exhibits of Lena Georgiev 2.

By copy of this letter, I am serving a copy of these documents upon all parties of record and enclose a Certificate of Service to that effect. I would appreciate your acknowledging receipt of these documents by date-stamping the extra copies that are enclosed and returning them to me via our courier.

If you have any questions or if you need any additional information, please do not hesitate to contact us. OX Duke

Sincerely,

WILLOUGHBY & HOEFER, P.A.

Benjamin P. Mustian

Enclosures

cc: Jeffrey M. Nelson, Esquire

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2007-286-WS

IN RE:)	
Application of Utilities Services of South Carolina, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service.	,))))	CERTIFICATE OF SERVICE
	,	

This is to certify that I have caused to be served this day one (1) copy of Rebuttal

Testimony and Exhibits of Bruce T. Haas and Rebuttal Testimony and Exhibits of Lena

Georgiev via hand delivery addressed as follows:

Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1441 Main Street, 3rd Floor
Columbia, South Carolina 29201

Clark Fancher

Columbia, South Carolina This 29th day of November, 2007.

RECEIVED

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2007-286-W/S



IN RE:)	
Application of Utilities Services of South Carolina, Inc. for adjustment of rates and charges and modifications to certain terms and conditions for the provision of water and sewer service.)))))	REBUTTAL TESTIMONY OF BRUCE T. HAAS

- Q. ARE YOU THE SAME BRUCE T. HAAS THAT HAS PREFILED DIRECT TESTIMONY IN THIS CASE?
- 3 A. Yes, I am.

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- Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS
 PROCEEDING, MR. HAAS?
 - A. The purpose of my rebuttal testimony is to respond to portions of the testimony of witnesses for the Office of Regulatory Staff filed in this matter. Specifically, I have reviewed Mr. Willie Morgan's testimony and would like to make a few observations in response.
- 10 Q. WHAT COMMENTS DO YOU HAVE ON MR. MORGAN'S TESTIMONY?
 - My first comment relates to Mr. Morgan's testimony regarding deficiencies identified by DHEC during routine inspections of USSC's water systems. As I stated in my direct testimony, USSC was formed in 2002 to acquire the assets of two public utilities, Utilities of South Carolina, Inc. and South Carolina Water and Sewer, LLC, which were both experiencing financial, operational and regulatory distress. At the behest of the DHEC, USSC acquired certain of the operating assets, the service territory and

certificates of these public utilities in October of 2002. Approximately half of the water systems had been found by DHEC to be operating in an unsatisfactory manner immediately prior to the transfer to USSC. Therefore, a large number of these systems have required substantial investment and extensive rehabilitation. USSC continues to make improvements in these systems to provide its customers with safe and reliable water service. This effort is shown by the fact that DHEC has recently rated nearly every USSC water system as "Satisfactory", and no system has recently received an "Unsatisfactory" rating. Since the acquisition, our focus has been on identifying and remedying the conditions in the various systems which DHEC had identified as constituting operational deficiencies. The Company has made a wide range of improvements and repairs to or replacements of the hydraulic, electrical, pneumatic, chemical feed and electronic components of these water systems. These improvements, repairs and replacements include water storage and chemical feed tanks, associated electronic and electrical control panels, hydro-fracturing and cleaning of wells, installation of new well pumping equipment and installation of water treatment equipment. Additionally, we have made substantial cosmetic and non-operational improvements; these would include sand-blasting and painting tanks, repair of well-house exteriors, repair or installation of fencing, landscaping, etc.

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Q. DO YOU HAVE ANY SPECIFIC COMMENTS WITH REGARDS TO MR. MORGAN'S ASSERTION THAT USSC SYSTEMS HAVE EXPERIENCED DEFICIENCIES DUE TO INADEQUATE SYSTEM FLUSHING OR HAVE INSUFFICIENT CAPACITY?

Yes. USSC performs regular flushing to ensure the provision of safe and reliable water service. Moreover, to my knowledge, the sanitary surveys for the Company's systems indicate that DHEC has found all of the systems' flushing programs to be satisfactory. Certain systems have experienced decreased capacity due to the recent drought and, therefore, the availability of water to perform flushing has been diminished. However, the Company has taken steps to put additional wells in operation or has acquired water from other sources. I would again note that the most recent DHEC

sanitary surveys have not rated any of the Company's water systems "Unsatisfactory." And all but one of the systems inspected by ORS for this case had a satisfactory compliance rating by DHEC. Mr. Morgan Exhibit WJM-2 reflects that one system, Estates at Hilton, was rated as "Unsatisfactory" as of August 1, 2006. However, the last survey conducted by DHEC on this system dated June 19, 2007, attached hereto as BTH Rebuttal Exhibit No. 1, upgraded the rating of this system to "Needs Improvement."

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REGARDING WATER LOSS ON THE SYSTEM DISCUSSED BY MR. MORGAN, HAS THE COMPANY TAKEN ANY STEPS TO REDUCE THE AMOUNT OF NON-ACCOUNT WATER?

Yes, the Company has taken steps in that regard. While we do not necessarily agree with all of his statements regarding the impact on customers of non-account water, we do appreciate Mr. Morgan's suggestions with regard to the amount of non-account water on certain of the Company's systems. Recently, the Company became aware of leaks on only a few of its systems which went undetected for a period of time. Unfortunately, these leaks did not manifest themselves in surface water ponding and, as such, were very difficult to locate. These occurrences have resulted in the Company undertaking a water audit in accordance with the American Waterworks Association, or AWWA, standard referenced by Mr. Morgan in all systems where non-account water either exceeds the 10% standard deemed acceptable by the AWWA or is a negative number. As to the former, I would note that the Commission has previously accepted the 10% standard as being reasonable and appropriate in its Order No. 2002-866 in Docket No. 2002-239-W/S, dated December 23, 2002. In addition, in all water systems that exceed that standard, we have begun to implement the leak detection program described by Mr. Morgan and have also begun recording all accounted-for water use, requested permission of bulk water providers to test their master meters, and compared those test results to customer meters, which will assist in determining the cause of both excess nonaccount water and negative non-account water. The Company reads this portion of Mr. Morgan's testimony as only suggesting a water audit of "subdivisions" where the 10% standard is exceeded or a negative number exists. If Mr. Morgan is suggesting that a water audit be conducted in every subdivision served by USSC, we would disagree that this is warranted. The Company does not object to the additional rate schedule language proposed in Mr. Morgan's Exhibit WJM-8 as long as it is understood that documented flushing and leaks constitute accounted for water.

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DOES THE COMPANY AGREE WITH MR. MORGAN'S SUGGESTED RATE SCHEDULE LANGUAGE WITH RESPECT TO CROSS-CONNECTION INSPECTION?

The Company does not believe that the language proposed by ORS is properly included in a rate schedule. As the Commission is aware, DHEC regulation 24A S.C. Code Ann. Regs. 61-58.7.F (Supp. 2006) requires customers with a cross-connection and a backflow prevention device to have the device inspected annually by a certified inspector. This regulation is to ensure safe operation of the water system and to prevent contaminated water from entering the drinking water system. These connections are neither installed by the Company nor at its direction; to the contrary, many, if not most, times cross-connections are made without the Company's knowledge. Rather, individual customers install these devices upon installation of such facilities as irrigation wells, swimming pools, fish ponds and the like and it is, therefore, the customer's responsibility to maintain this device and have the device tested annually. The Company has no objection to providing customers a thirty-day written notice that cross-connection testing will be performed by USSC if the customer does not have the cross-connection independently tested as suggested by ORS. Mr. Morgan has additionally suggested, however, that USSC be required to notify customers of the estimated cost of the testing and proposes that certain language be included in the Company's rate schedule. Because USSC operates throughout the state, the cost of such testing may vary widely from region to region and even between inspectors within each region. Estimating the potential cost to each consumer would be time consuming and burdensome to the Company and may not accurately represent the cost ultimately borne by the consumer, thus leading to potential consumer relations problems. USSC would not object to informing customers of DHEC's website and contact information. Additionally, because cross-connections are installed independently of the Company and at the desire of individual customers and that DHEC regulations separately require this testing, USSC does not believe this language is appropriately included in its rate schedule. I would note that the rate schedule language pertaining to cross-connection inspection testing has previously been allowed in dockets involving USSC affiliates, including Carolina Water Service, Inc. and Tega Cay Utilities, Inc., and was previously allowed in the Company's last rate case in Docket No. 2005-217-W/S.

Q.

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IS IT REASONABLE FOR USSC TO ALLOW CUSTOMERS A SIXTY-DAY PERIOD IN WHICH THE CUSTOMER MAY MAKE PAYMENT FOR CROSS-CONNECTION INSPECTION SERVICES WITHOUT INCURRING A LATE FEE OR INTEREST CHARGE?

No. I believe this proposal is neither reasonable nor in accordance with the Commission's regulations. Commission Regulation 26 S.C. Code Ann. Regs. R. 103-723.3 states that a "maximum of one and one-half percent (1 1/2 %) may be added to any unpaid balance not paid within 25 days of the billing date to cover the cost of collection and carrying accounts in arrears." In the event the customer fails to obtain the necessary cross-connection inspection, USSC will be required to perform the inspection in order to comply with DHEC regulations. The cost of this inspection will be passed through to the customer without mark-up. In other words, the Company will not monetarily benefit from passing these charges through to the customer. USSC does not believe it is reasonable for it to bear the burden of these costs for an extended period of time when it is merely requiring the customer to comply with the requirements set forth by DHEC relating to a device that is independently installed by the customer.

DOES BIO-TECH PERFORM SLUDGE HAULING SERVICES FOR USSC?

Yes. Contrary to Mr. Morgan's assertion that Bio-Tech has not performed sludge hauling or disposal services for USSC, Bio-Tech routinely hauls sludge from two USSC wastewater plants in Rock Hill. Although these plants are activated sludge type plants with small digesters, they do require sludge hauling on an on-going basis. Additionally, the other two facilities in Rock Hill are lagoon-type systems. Bio-Tech has performed

work on these systems as well, including maintenance work and cleaning of the chlorine contact basin. It is my understanding that expenses associated with Bio Tech were included in the test year expenses and I am not aware that ORS has proposed to disallow these expenses. I further understand that documentation with respect to these expenses has been supplied to ORS. Ms. Georgiev will address this in her rebuttal testimony as well.

7 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

8 A. Yes, it does.

IOV-27-2007 17:14	CAROLINA WATER SERVICE	P.025
SCDHEC	Public Water System Inve	entory Report Form
Bureau of Water		
Site Name: USSC/ESTATES A System Number: 3250103 Fax Number: (803)791-8643	T HILTON	(A)dd. (M)odifix. (R)enum. (D)elete: Reason: SCI SUIVEU Today's Date:
	<u> </u>	Sine info Address:
Owner: USSC THE ESTATES @ Attn: BRUCE HAAS PO BOX 4509 WEST COLUMNIA SC20174	HILTON	HILTON VIEW DR CHAPIN, SC * Relation Contact: None
WEST COLUMBIA, SC 29171	1796- 95 45	*Phone: ` DW Mail Attention: LARRY BODIE
Owner Business Telephone: (803) Owner Emergency Telephone: (803)	•	DW Contact Telephone: NONE
Contact and Indiana Contact Co	System Character	istica
System Type. C Subtype Owner Type PRIV	Inact Code	Service Area R1 Season On (mo/day) 01/01 Counties Served: Season Off (mo/day) 12/31 32
	Statistical Inform	nation
Source Use information:		Number of Service Connections:
Percent Surface Water	a	Residential
Percent Ground Water.	100	Non Residential
Percent Purchased Surface Water.	0	Maximum Allowable 76 19_
Percent Purchased Ground Water	. 0	Permitted 435
Total must add	\ 	
		Production (MGD):
Number of Surface Water Sources.	• •	Average
Number of Ground Water Sources	. 1	Maximum Day
Purchased Suface Water Sources	. D	Capacity
Number of Permanent SW Sources	. 0	ACTE
Number of Emergency SW Sources	l l	TVIAN ALLE TO THE TOTAL AND ADDRESS OF THE TOTAL AD
Number of Permanent GW Sources.		Emergency u.doud
Number of Emergency GW Sources.	. 0	Storage
	1	Storage:
Service Population:		Crevater (was):
Population.,,	54	Grand fact
Secondary Population	. 0	Pressure (TG) 7.500
* Add/change contact	comments and phone info here.	remain in allowable will remain 19 until well yield test is performed and a realistic mumber can be calculated.
Signature:		•
June 19, 2007	Page 1	of 1 dwinvent.rdf

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P.008

NOV-27-2007 17:14 CAROLINA WATER SERVICE

P.026

SCDHEC	Public \	Water System Source/Plar	it inventory Report	
Bureau of Water	•	•		M
Site Name: USSC/ESTATES	AT HILTON		(A)dd. (M)odify, (B)enum. (D)ele	ta:
System Number: 3250103	•		Reason: San S	J CVEY
Source ID: G32867			Todays Date:	-(')
	:	General Information	•	
	:		Availability Code P	
Location ACR 129 HILT Source Name WELL #1			_	065120
Receiving Plant NONE	1		Longitude 61.29	17990
Plant ID NONE			Source Code G	
		Ground Water Source Info		
Well Characteristics			Well Pump Characteristics	7.50
Depth (ft)			Horaepower	7.50 S
Type			Design Yield (gpm)	60.00
Casing Diameter (in)	. °		Tast Yield (gpm)	7000 85 D
Under the Direct influence of SW?	N .		Avg. Daily Production (TGD)	7.878,14
	:	•	Regulated Capacity (TGD)	57,60
		Troolment Codes		
	.	- 11000ment acces		
N0000	.			
	;	Comments *pump was pumping out throddled pump		
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June 19, 2007		Page 1 of 1		prosecrat
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P.027

CAROLINA WATER SERVICE

SCDHEC **Bureau of Water**

Public Water System Sanitary Survey Report Ground Water Systems

Site name: USSC/ESTATES	AT HILTON	Lace Supreme 08/01/2006	Survey Date: 4 /4 /
System number: 3250103 SOURCE: ① Quantily. 2. Protection from Contam. 3. Security. 4. Wellnead Piping. 6. Flow Measuring Device. WATER TREATMENT: 7. Filtration. 8. Equipment Maintenance. 9. Chemical Storage & Hend. 10. Chemical Feed. 11. Chamical Injection Points. DISTRIBUTION: 12. Water Quality. 13. Operation & Control. 14. Adequate Pressure. 15. Fire Flow. 16. Cross Connection Control. 17. Valve/Hydrant Maintenance 18. Flushing Program. 19. Leak Detection and Repair. 20. System Map. 21. Sample Siting Plan.	H. S. S. S. Z. Z. Z. Z. Z. S.	CPERATIONAL CONTROL: 2a. Cordined Operator/Staffing*. N 29. Testing Equipment*	D. Distribution Operator Grade A
STORAGE: 23. Capacity. 24. Sanitary Protection. 25. Security. 26. Appurtenances.	N S S S S + .	T	Follow up scheduled? Date scheduled J. Overall Reling K. Operator/Owner present? Y
THE SEME ISSUES THE SEME ISSUES TAPPLICABLE for treated systems	MUST only.	Well still not If demand, They HAVE , HELEVIRE THIS SLIMMER. KELTING LET WETHEN DEMAND THE PERCENTAGE. BYSTOM, NOT AN APPROVED IN EXPERTAGE THE SYSTEM.	FRINCTURES THE WELL
June 19, 2007		Page 1 of 2	, gwsterdw.rdf
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NOV-27-2007 17:15

CAROLINA WATER SERVICE

P.028

SCDHEC

Bureau of Water

Public Water System Sanitary Survey Report **Ground Water Systems**

Site name:

USSC/ESTATES AT HILTON

System number: 3250103

Last Survey: 08/01/2006

Comments

1. Well was breaking suction in surpmer months.

will have tank out to keep pressure up while they do 24 drawdown to see how much capacity is in well. to be done early Sept.

Regional Monager

June 19, 2007

Page 2 of 2

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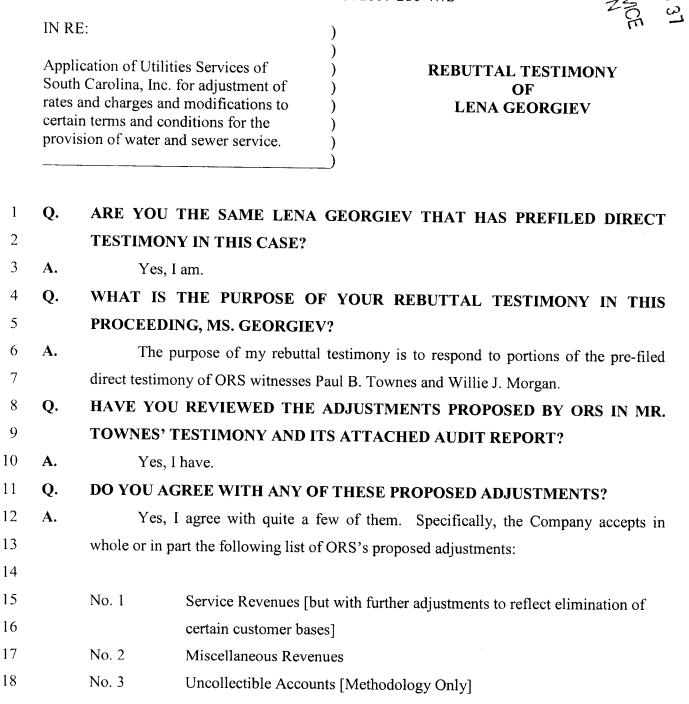
P.011

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2007-286-W/S



1	No. 4	Wage Adjustment							
2	No. 5	Purchased Water Expense							
3	No. 6	Maintenance and Repair Expense							
4	Nos. 7-9	Consumer Price Index - Maintenance Testing, Meter Reading, and							
5		Chemicals Expense							
6	No. 10	Transportation Expenses							
7	No. 11	Operating Expense Charged to Plant							
8	No. 12	Transfer of Subdivisions							
9	No. 13	DHEC Safe Water Testing Fee (Not an over collection, however)							
10	No. 14	Office Salaries							
11	No. 15	Consumer Price Index – Office Supplies and Other Office Expenses							
12	No. 16	Rate Case Expense [but with further adjustments to reflect actual rate case							
13		expense updated through November 29, 2007 and through the hearing.]							
14	No. 17	Annualize Pension and Other Benefits							
15	No. 18	Rent Expense							
16	No. 19	Consumer Price Index Adjustment – Office Utilities							
17	No. 20	Allocation Adjustment							
18	No. 21	Fines and Penalties							
19	No. 22	Depreciation Expense Adjustment [Methodology Only]							
20	No. 23	Amortization of Contributions in Aid of Construction (CIAC)							
21	No. 24	Plant Acquisition Adjustment							
22	No. 25	Payroll Taxes							
23	No. 26	Utility/Commission Taxes [Methodology Only]							
24	No. 27	Income Taxes [Methodology Only]							
25	No. 28	Interest on Customer Deposits							
26	No. 31	Pro Forma Plant Retirements							
27	No. 32	Vehicle Allocation							
28	No. 33	Elevated Storage Tank							
29	No. 34	Extraordinary Retirement							
30	No. 35	Plant Transfers							

l		No. 36	Plant Transfers
2		No. 37	Organizational Cost
3		No. 38	Accumulated Depreciation [Methodology Only]
4		No. 39	Accumulated Depreciation - Vehicles
5		No. 40	Accumulated Depreciation
6		No. 41	Accumulated Depreciation [Methodology Only]
7		No. 42	Accumulated Depreciation
8		No. 43	Accumulated Depreciation
9		No. 44	Cash Working Capital [Methodology Only]
10		No. 45	Plant Acquisition Adjustment
11		No. 46	Deferred Maintenance
12		No. 47	Service Revenues - Company's Proposed Increase [Methodology Only]
13		No. 48	Miscellaneous Revenues – Proposed Increase [Methodology Only]
14		No. 49	Uncollectible Accounts [Methodology Only]
15		No. 50	Utility/Commission Tax [Methodology Only]
16		No. 51	Income Tax [Methodology Only]
17			
18	Q.	WOULD	YOU PLEASE DISCUSS THE PORTION OF THE PROPOSED ORS
19		ADJUSTN	MENT TO SERVICE REVENUES WITH WHICH YOU DO NOT
20		AGREE I	N WHOLE?
21	Α.	Ye	s. ORS has adjusted the Company's Operating Expenses so as to reflect the
22		transfer of	three subdivisions - Lakewood Estates, Arrowhead Shores, and Pleasant Hills.
23		While the	Company agrees with the removal of these expenses, USSC believes that ORS
24		has failed	to make the corresponding adjustment to Service Revenues to reflect the
25		elimination	n of these customers. USSC therefore believes that a corresponding adjustment
26		to service	revenues in the amount of \$45,905 for the test year period is appropriate and
27		warranted.	
28	Q.	ARE THI	ERE OTHER ORS ADJUSTMENTS WITH WHICH YOU ARE NOT IN
29		COMPLE	TE AGREEMENT?

A. Yes. ORS's adjustment to Rate Case Expense includes expenses incurred to the date of their Direct Testimony totaling \$104,318. These expenses included mailing costs, legal and consulting fees and direct time spent on the rate case by Water Service Corporation employees as of that date. ORS's adjustment does not, however, include attorneys' fees, the cost of capital witness fees and capitalized time for WSC employees to bring this case to conclusion, including the hearing. Attached hereto is LG Rebuttal Exhibit No. 1, which sets out the Company's costs incurred to date and an estimated cost through the hearing date. We will further update the rate case expenses at hearing. Documentation with respect to these expenses has been or will be provided to ORS for review. There should be no argument that the Company has incurred or will incur these expenses and they should be included in rate case expense in this case.

Q. DOES THE COMPANY BELIEVE THAT FURTHER ADJUSTMENTS BEYOND THOSE PROPOSED BY ORS ARE WARRANTED?

Yes. The Company has incurred \$70,218 in additional costs for pro forma projects in service as of October 31, 2007, but documentation for which was unavailable at the time ORS conducted its on-site audit. Documentation supporting these projects has now been provided to ORS, the projects are currently used and useful in providing service to customers, and the projects should, therefore, be properly included in rate base.

Q. YOU PREVIOUSLY INDICATED THAT YOU ONLY AGREED WITH THE METHODOLOGY OF CERTAIN OF ORS'S ADJUSTMENTS. COULD YOU PLEASE CLARIFY YOUR POSITION?

A. Certainly. The Company agrees with the methodology utilized in calculating certain adjustments such as those made to uncollectible accounts, depreciation, taxes and cash working capital. However, the adjustments I have identified in my testimony would necessarily impact each of those calculations.

Q. YOU HAVE ALSO REVIEWED MR. MORGAN'S TESTIMONY, IS THAT CORRECT?

28 A. Yes, I have.

A.

1	Q.	DO YOU HAVE ANY COMMENTS ON MR. MORGAN'S ASSERTION THAT
2		BIO-TECH HAS NOT PERFORMED ANY SLUDGE HAULING OR DISPOSAL
3		SERVICES FOR USSC?
4	A.	Yes. As Mr. Bruce Haas states in his testimony, Bio-Tech did provide sludge
5		hauling and disposal services for USSC during the test year and since. I have attached as
6		LG Rebuttal Exhibit No. 2 a copy of the General Ledger and corresponding invoices
7		documenting those expenses which were made available to ORS during its audit.
8	Q.	DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
9	A.	Yes, it does.

10

Utilities Services of South Carolina Estimated Rate Case Expense Test Year Ended December 31, 2006

Schedule 7

					Total		
					I OTH		
Legal Fees (John Hoefer, Esq.				\$		(actual)	
Legal Fees (John Hoefer, Esq.)			\$	17,500	(estimated)	
Customer Notices:							
Postage	14,460 =	=	notices x \$0.41	\$	5,929	(estimated)	
Stock	14,460 =		notices x (.0526		761	(Diameter)	
Travel, Misc.				\$	2,100	(estimated)	
Water Service Personnel							
actual and up to hearing	hours	rate	\$				
SL	20	\$ 89	\$ 1,780				
JQM	151	33					
ĸw	80	45					
LG	600	43	25,800				
BWS	500	27					
MR	300	34					
MM	100	14					
JH	4	96					
EP	6	31	186				
LY	100	25	2,488				
Misc. Operators (2006)	20	31					
Misc. Operators (2007)	87	35	3,063				
Total					68,009		
Cost of Capital Witness (AUS	Consultan	ts)		\$	12,500	(actual)	
Cost of Capital Witness (AUS				\$		(estimated)	
Costs of Postage, Mailing, Fed	dEx and Co	pies			535	(actual)	
Total Cost of current case				\$	179,462		
Total Cost of Cultent case							
Total					179,462		
Amortized over 2 years				·	2		
Amortization Expense per year	ar			\$	89,731	Water	Sewer
Total Amortization Expense i	n this proce	eeding		_\$	89,731	\$ 85,065	\$ 4,666
ORS proposed RC Expense (\$104,318/2 ₃	years)			(52,159)	(49,447)	(2,712)
USSC proposed adjustment					37,572	35,618	1,954

GL1.2.2-2		DETAIL G	1	ENERAL LEDGER - GL			11:33:12	28 NO	V 2007 PAGE 1	
		FOR THE 14	I	PERIODS ENDING 12/	31.	/06				
CO SUBD ACCNT	DESCRIPTION	DEBIT		CREDIT	EF	F DATE	JOURNAL		BALANCE	
	SEWER-SLUDGE HAULING							BEG		0
	SE05 ACCRL 071*SE05.6A*06*12 170 07-07		330	33	ю		071-SE05.6A-06-12 071-REVERSE.JE-07-92			
	-2006			•						
	SE05 ACCRL 24909*16900*BIO TECH		110 110				071-SE05.6A-07-13 071-AP.INVD-08-63			
	071*SE05.6A*07*13 13 08-02-		110	11	0		071-REVERSE.JE-08-35			
	2006 SE05 ACCRL		110			9/5/2006	071-SE05.6A-08-13			
	071*SE05.6A*08*13 21 09-05-		110	11	0		071-REVERSE.JE-09-36			
	2006									
			660	55	60			NET END		110 110
0741405417754009	CEWER CLURCE HAIRING							BEG		0
0/1-1354-7754006	SEWER-SLUDGE HAULING 6147*02527*LIQUID WA		240				071-AP.INVD-01-49	DLQ		·
	SE05 ACCRL 071*SE05.6A*01*13 14 02-03-		110	11	10	2/3/2006	071-SE05.6A-01-13 071-REVERSE.JE-02-35			
	2006			''			071-112721102.02-02-00			
	9356*16900*BIO TECH		110 320				071-AP.INVD-02-55 071-AP.INVD-03-64			
	11502*02527*LIQUID W SE05 ACCRL		105			4/6/2006	071-SE05.6A-03-13			
	071*SE05.6A*03*13 1 04-06-2			10	05		071-REVERSE.JE-04-49			
	13962*16900*BIO TECH	1	105				071-AP.INVD-04-49			
	R10869 V16900			28	85	5/31/2006	071-MOVE.A-05-04 071-AP.INVD-06-64			
	19531*02527*LIQUID W SE05 ACCRL		320 385			7/7/2006	071-SE05.6A-06-12			
	21274*02527*LIQUID W		280				071-AP.INVD-07-48			
	21478*16900*BIO TECH 071*SE05.6A*06*12 171 07-07		385		85		071-AP.INVD-07-50 071-REVERSE.JE-07-92			
	-2006	5								
	22988*02527*LIQUID W SE05 ACCRL		280 374			8/2/2006	071-AP.INVD-07-56 071-SE05.6A-07-13			
	24909*16900*BIO TECH		374				071-AP.INVD-08-63			
	071*SE05.6A*07*13 14 08-02-	5		3,	74		071-REVERSE.JE-08-35			
	25548*02527*LIQUID W		280			0/5/2006	071-AP.INVD-08-67			
	SE05 ACCRL 071*SE05.6A*08*13 22 09-05-		374		74	9/5/2000	6 071-SE05.6A-08-13 071-REVERSE.JE-09-36			
	2000	3				0/20/2006	074 PEOF 64 00 14			
	SE05 ACCRL 29685*16900*BIO TECH		330 330			9/29/2006	071-SE05.6A-09-14 071-AP.INVD-10-58			
	071*SE05.6A*09*14 52 09-29-				30		071-REVERSE.JE-10-57			
	2000 35273*16900*BIO TECH	6	440	1			071-AP.INVD-12-61			
	002.3 (0000 5.0 (25))							NET	9	3,179.00
		5	5,142.00	1,963.	.00			END		3,179.00
071*1355*7754008	-SEWER-SLUDGE HAULING-							BEG		0
GL1.2.2-2		DETAIL		GENERAL LEDGER - 0	G L	•	11:33:1	2 28 N	OV 2007 PAGE	2
		FOR THE 14		PERIODS ENDING 12/	/ 3	31/06				
CO SUBD ACCNT	DESCRIPTION	DEBIT		CREDIT	E	FF DATE	JOURNAL		BALANCE	
	SE05 ACCRL		38	5	-	2/3/200	6 071-SE05.6A-01-13			
	7823*16900*BIO TECH		38	5			071-AP.INVD-02-42			
	071*SE05.6A*01*13 15 02-03-	96		3	385		071-REVERSE.JE-02-35	•		
	SE05 ACCRL	•	34			3/2/200	6 071-SE05.6A-02-17			
	10470*16900*BIO TECH 071*SE05.6A*02*17 7 03-02-2		34		341		071-AP.INVD-03-58 071-REVERSE.JE-03-43	3		
		6								
	14297*02527*LIQUID W 19531*02527*LIQUID W		32 28				071-AP.INVD-04-48 071-AP.INVD-06-64			
	21274*02527*LIQUID W		32	0			071-AP.INVD-07-48			
	22988*02527*LIQUID W		28			0/0/000	071-AP.INVD-07-56			
	SE05 ACCRL		34	1		8/2/2011	6 071-SE05.6A-07-13			

LG Rebuttal Exhibit No. 2 Page 2 of 14

	071*SE05.6A*07*13 15 08-02- 2006		341	071-REVERSE.JE-08-35	
	SE05 ACCRL 071*SE05.6A*08*13 23 09-05- 2006	341	341	9/5/2006 071-SE05.6A-08-13 071-REVERSE.JE-09-36	
	SE05 ACCRL 29685*16900*BIO TECH 071*SE05.6A*09*14 53 09-29- 2006	671 671	671	9/29/2006 071-SE05.6A-09-14 071-AP.INVD-10-58 071-REVERSE.JE-10-57	
	35464*16900*BIO TECH 38110*16900*BIO TECH	440 320		071-AP.INVD-12-64 071-AP.INVD-12-73	
		5,777.00	2,079.00		NET 3,698.00 END 3,698.00
	GRAND TOTALS:	11,579.00	4,592.00	ı	BEG 0 NET 6,987.00 END 6,987.00
!		DETAIL G REPORT SPE	ENERAL LEDGER - GL CIFICATIONS ARE:	11:33:12	28 NO V 2007 PAGE 3
	REP LED PER	ORT DESCRIPTION GER ID - GL IOD - 01-14	#NAME?	EDGER-G L	
	STR SEL SUB	COMPANY UCTURE - 2 ECTION - 071 TOTAL -			
	STR SEL SUB	SUBDIV UCTURE - 6 ECTION - ALL TOTAL -			
	STR SEL SUB	ACCOUNT UCTURE - 1 ECTION - 7754008 TOTAL -			
		MENT - PRIOR YR O SUPPRESS - Y AUTO JOURNALS - E BREAK - N T BREAK - N IOD BREAK - N ECTIVE RATE - N E - SEFECTIVE T SEQUENCE -1 #NAME? -2 #NAME? -3 #NAME?	ACT N N		

GL1.2.2-2

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

BILL TO:

UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171



LG Rebuttal Exhibit No. 2 Page 3 of 14

INVOICE



INVOICE #

CUST#

7/31/2006 19974-1347

0000005

\$110.00

SHIP TO:

UTILITIES SERVICES OF S. CAROLINA FOXWOOD WWTP FOXWOOD SUB 1347 FORT MILL, SC 29715

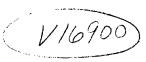
P.O.	Willer 🔻	TERMS	SALES PERS	ON + A - I'll
		NET 10	5000	
QUAY	07/20/06	DESCRIPTION - Transported and disposed of 1,000 gallons	a a traditional distribution with the Processing Color of a confidence of the processing of the Color of Section (Color of the Color of the C	MOUNT
	of sludge.	•		
1000.00 1000.00		g Charge 0.05 ransportation Charge 0.06	0.05 0.06	50.00 60.00
	Mm	7)-1347-77549.		
UB# UB NAME	1347 WATE (SE	WEIGOR BOTH CIRCLE		
ETHEMENT 14FO 10SS RSF, INVENCES APPROVAL	(BTAP)	SATE		
TATE RECEIVED	and the second s	SUBTOTAL		\$110.00

TOTAL

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

BILL TO:

UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171



LG Rebuttal Exhibit No. 2 Page 4 of 14

INVOICE

DATE 1/27/2006 INVOICE # 0127061354

CUST# 0000005

SHIP TO:

UTILITIES SERVICES OF S. CAROLINA CAROWOODS WWTP CAROWOODS SYSTEM 1354 ROCK HILL, SC 29731

P.O. NUMI	BER TERMS	SALES PERS	ON TO
	NET 10	5000	
CUAN	DESCRIPTION	PRICE EACH	MOUNT
	12/29/06 - Pumped Chlorine Contact Chamber and disposed of 1,000 gallons of sludge.		
1000.00	Receiving Charge 0.05	0.05	50.00
1000.00	Sludge Transportation Charge 0.06	0.06	60.00
	071-1354-7754008		
	the second secon		

OK mm

51.4 SUP NAME SCREWENT HEO CID ES NET. INVENCES

APT-ROVAL DATE RECEIVED EIVEUFEBZ

SUBTOTAL

TOTAL

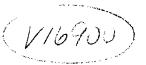
\$110.00

\$110.00

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

BILL TO:

UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171



LG Rebuttal Exhibit No. 2 Page 5 of 14

INVOICE

DATE

INVOICE #

CUST#

0000005

3/31/2006

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SHIP TO:

P.(D. NUMBER		A confidence of the confidence	TERMS	SALES P	ERSON
	1354 S		1	NET 10	500	10
QUAN			DESCRIPTION - Cleaned solids from C and disposed of 1,000		PRICE EACH	AMOUNT
		, j. <i>j</i> .	71 1251	775 400) 2	
			//-/034-	- / / J 700	7 (
		***************************************	Paranta a Lambara (1977), a principal de la proposações de la prop	and the second of the second o		
18#	1354	L WATER SE	EXED)OS BOTH CIROLE			
D NAME						(2)
111 25 (136 - 45 70 4166 - 1351 HAVE DI	ie .					
	BTH) Darkit	2 2005	SUBTOTAL		\$105.00
ATE RECEIVED			* £330	TOTAL		\$105.00

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TERMS

LG Rebuttal Exhibit No. 2 Page 6 of 14

SALES PERSON

INVOICE

DATE

INVOICE #

CUST # 0000005

6/29/2006

19963-1354

BILL TO:

UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171

P.O. NUMBER

BIO TECH, INC ENVIRONMENTAL SV

P.O. BOX 4569

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

SHIP TO:

- Street and Balking Process of Mark				NET 10	500	000	
QUAN	And the second	vacuum t	DESCRIPTION - Skimmed 4 small ruck and dumped los Foxwood Hills.		PRICE EACH	AMOUNT	
		071-	1354-7	754008			
			Sludi t				
			Sludi H	i K nn			
	1364	_ WATER SEW	ER) OR BOTH CIRCLE				
Vent INFO 1971, AVOICES	1354 	WATER SEW	CATE			(2)	
AME WEST INFO OF ST. ANY CICES VOLL PCCEIVED	1354 			SUBTOTAL		\$385.0	

WEST COLUMBIA, SC 29171 Phone: 803-796-8925



UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171



LG Rebuttal Exhibit No. 2 Page 7 of 14

INVOICE



INVOICE #

CUST #

7/31/2006

20658-1354

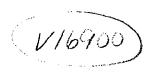
0000005

SHIP TO:

	Hint of the state	TERMS	SALES PERSO	JN S
		NET 10	5000	
CU		DESCRIPTION	PRICE EACH	TNUON
	07/28/06 - of sludge.	Transported and disposed of 3,400 gallons		
3400.00	Receiving	Charge 0.05	0.05	170.0
3400.00	Sludge Tra	ansportation Charge 0.06	0.06	204.0
	07	1354.7754.00		
	h a	\sim		
	l			
/	354 WATER SEAT	STATE OF THE OFFICE OFFICE OFFICE OFFICE OFFICE OFFICE OFFICE OFFICE OFF		
• `	374 MAINER SEA	ER DR BOTH CIRCLE		
NAME		a Artifa des Alles III y Marcia (Artifa III) a Marcia (Artifa III)		
GENERALINEO		The Committee of the Co		
ss ref involces	(BTW)	· · · · · · · · · · · · · · · · · · ·		
MOVAL	UM)			
RECEIVED _		SUBTOTAL		\$374.0
		ΤΟΤΔΙ	1	\$374.0

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171



LG Rebuttal Exhibit No. 2 Page 8 of 14

INVOICE



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	A Parameter of		EFINS	SALES PERSON	10-15-1
		N	IET 10		
trough and all a	The state of the s	DESCRIPTION	the control of the second of t	PRICE EACH	T.
	09/21/06 - T of sludge.	ransported and dispos	sed of 3,000 gallons		
	or sidage.				
		معاقبها معاد فحيضه لها أن المعادل المالية الما	a a a a a a a a a a a a a a a a a a a	Notice of the state of the stat	
			1 1	The Committee of the Co	
	/	71-1355	1-77540	08	
		,,,,,		Commence of the Commence of th	
	The same with any and a series	والمنافرة	المعارية والمعارض والمتعارض والمعارض والمعارض والمعارض والمعارض	Serve to the server to the ser	
	10611	_			
ริบิธี#	1354 WATER SEV	FR OR SOTH CINCLE			
SUB NAME				/	
PETIAEVENT OF	en e	the state of the s		(-	2)
*(000 ft)	~ Mth	enter de la company en la company de la comp			
APPRIMA	(BIR)	PTF	SUBTOTAL	\$33	30.00
DATE SECENSO	ECEIVED OCT	- 2 2006	TOTAL	\$33	30.00

V15/20) TECH, INC ENVIRONMENTAL SV

LG Rebuttal Exhibit No. 2 Page 9 of 14

INVOICE

INVOICE#

1/27/2006

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UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171

P.O. BOX 4569

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

UTILITIES SERVICES OF S. CAROLINA COUNTRY OAKS WWTP COUNTRY OAKS SYSTEM 1355 ROCK HILL, SC 29731

-		NET 10	5000	
KOM BA	DESCRIPTION	ONUM	PRICE EACH A	MOUNT
	01/23/06 - Transported and	disposed of 3,500 gallons		
	of sludge.			
3500.00	Receiving Charge 0.05		0.05	175
3500.00	Sludge Transportation Cha	rga 0.06	0.06	210

171-1355-7754008

J(5#

SUBTOTAL

TOTAL

\$385.00

\$385.00

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

INVOICE







7/31/2006

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\$341.00



UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171 SHIPTO

UTILITIES SERVICES OF S. CAROLINA COUNTRY OAKS WWTP COUNTRY OAKS SYSTEM 1355 ROCK HILL, SC 29731

	NET 10	5000	
	DESCRIPTION STATES	PRICE EACH	MOUNT
	06/29/06 - Transported and disposed of 3,100 gallons		
3100.00	of sludge. Receiving Charge 0.05	0.05	155.0
3100.00	Sludge Transportation Charge 0.06	0.06	186.0
	$M \sim$		
	MM		
126			
/ <u>33</u>	5 VALUE OF BOTH CIRCLE		
CAME			
1 PF (NVO)0ES			
BI	SUBTOTAL		\$341.0
IT CENTO	- Cobiotal		ψ υ Ψ1.0

TOTAL



LG Rebuttal Exhibit No. 2 Page 11 of 14

, INC ENVIRONMENTAL SV P.O. BOX 4569

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

UTILITIES SERVICES OF S. CAROLINA

WEST COLUMBIA, SC 29171

#: (**% (** •)

PO BOX 4509





INVOICE



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UTILITIES SERVICES OF S. CAROLINA **COUNTRY OAKS WWTP COUNTRY OAKS SYSTEM 1355** ROCK HILL, SC 29731

	TERMS	SALES PER	son:
	NET 10	5000	
	DESERVICE	PRICE EACH	AMOUNT
	02/24/06 - Transported and disposed of 3,100 gallons		
3100.00 3100.00	on 2/24/06. Receiving Charge 0.05 Sludge Transportation Charge 0.06	0.05 0.06	155.00 186.00

071-1355-7754008

SUB#	4355 WATER SEWER OR BOTH CIRCLE
SUR NAME	The second secon
WENTERED TO	and the second
	(BD)
ANE RECEIVED	RECEIPED IN COND.

\$341.00

SUBTOTAL

\$341.00 **TOTAL**

LG Rebuttal Exhibit No. 2 Page 12 of 14

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INVOICE







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9/29/2006

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UTILITIES SERVICES OF S. CAROLINA COUNTRY OAKS WWTP COUNTRY OAKS SYSTEM 1355 ROCK HILL, SC 29731

	JERNE .	STATES OF THE STATES OF THE	2 (B-24) (17)
	NET 10		
em .	DESCRIPTION	PRICE EACH A	MOUNTER
	09/20/06 & 09/28/06 - Transported and disposed of		
	6,100 gallons.		
6100.00	Receiving Charge 0.05	0.05	305.00
6100.00	Sludge Transportation Charge 0.06	0.06	366.00

071-1355-1754008

/355

1014). 1 - 2 2001

(SEVER)OR BOTH CACLE

BIO TECH, INC ENVIRONMENTAL SV

P.O. BOX 4569

WEST COLUMBIA, SC 29171 Phone: 803-796-8925

UTILITIES SERVICES OF S. CAROLINA

WEST COLUMBIA, SC 29171

1: 14.

PO BOX 4509

SUBTOTAL

\$671.00

TOTAL

\$671.00

SUBSTANCE

FERNISHEN NAME

FOR CONTINUE

APPROVING

DATE EXCENSES

WEST COLUMBIA, SC 29171 Phone: 803-796-8925



UTILITIES SERVICES OF S. CAROLINA PO BOX 4509 WEST COLUMBIA, SC 29171

V15/36

LG Rebuttal Exhibit No. 2 Page 13 of 14

INVOICE







12/3/2006

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SHIP TO:

UTILITIES SERVICES OF S. CAROLINA COUNTRY OAKS WWTP COUNTRY OAKS SYSTEM 1355 ROCK HILL, SC 29731

अस्य स्थाप	TERMS	SALES PERS	ON /
	NET 10		
/e eu	DESCRIPTION	PRICE EACH	MOUNT
	11/17/06 - Pumped Sewer Sludge from Digester at		
	Country Oaks WWTP		
4000.00	Receiving Charge 0.05	0.05	200.00
4000.00	Sludge Transportation Charge 0.06	0.06	240.00

071-1355-7754008

13.55 NAID (SENDER) OR SUITE CHOICE y6,63# ALE NAME en agyana 1.70 The SIF INCLES **SUBTOTAL** SPERCHAL CENTEDER BIAK

\$440.00

TOTAL

\$440.00

8037910622

TO: 18474981137

P.8/18

BIO TECH, INC ENVIRONMENTAL SV P.O. BOX 4569

WEST COLUMBIA, SC 29171 Phone: 803-796-8925 SECOND PROVIDE

1/16/00

INVOICE

INVOICE #

18263-673

CUST# 0000001

BILL TO:

CAROLINA WATER SERVICE, INC.; S.C. PO BOX 4509

WEST COLUMBIA, SC 29171

SHIP TO:

DATE

10/26/2006

CAROLINA WATER SVC, INC.; S.C. - Country O:

., Р	O. NUMBER S	TERMS NET 10	SALES PER	SON
QUAN 1.00	DESCRIPTIO		PRICE EACH	AMOUNT 320.00
	Oaks WWTP.	and the state of t	020.00	020.00
	and the second s		_	
	071-1355-	7754003		٠
		and the second s		
	The state of the s			
	1355 MATERIAN OR BOTH ORDER			
1 E 	and the second s		, ;	
OKTOTA OKTOTA			,	7
NI.	(B1)P)	SUBTOTAL		\$320.00
	인터[2](1) 전 10 (1985) - 10 (19	44010100		*******